UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

DAVID DELL'AQUILA, on behalf of)	
himself and all others similarly situated,)	
Plaintiffs,)	
v.) No. 3	:19-cv-00679
WAYNE LAPIERRE, the NATIONAL)) Judge	Campbell
RIFLE ASSOCIATION OF AMERICA,) Magis	strate Frensley
and the NRA FOUNDATION, INC.)	-
,)	
Defendants.	,)	
	′	

NRA FOUNDATION'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Defendant NRA Foundation, Inc. ("Defendant"), pursuant to Fed. R. Civ. P. 6(b)(1) and LR 6.01(a), respectfully moves this Court for an extension of time up to and including December 30, 2019 to answer or otherwise respond to Plaintiff's Amended Complaint (D.E. 5). In support of its Motion, Defendant NRA states as follows:

- 1. Defendant was served with a copy of Plaintiff's Amended Complaint on October 25, 2019, making the default response deadline November 15, 2019. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).
- 2. Undersigned counsel has just recently been retained by Defendant and respectfully needs additional time to prepare and file a responsive pleading to Plaintiff's Amended Complaint.
- 3. On November 8, 2019, undersigned counsel communicated with the *pro se* Plaintiff, who does not oppose this Motion.

For these reasons, Defendant respectfully requests the Court grant this Motion and grant it

an extension of time up to and including December 30, 2019 to answer or otherwise respond to Plaintiff's Amended Complaint.

Dated: November 11, 2019 Respectfully Submitted,

NEAL & HARWELL, PLC

/s/ William J. Harbison II Aubrey B. Harwell, Jr. (BPR # 2559) John E. Quinn (BPR # 12220) William J. Harbison II (BPR # 33330) 1201 Demonbreun Street, Suite 1000 Nashville, TN 37203 (615) 244-1713 aharwell@nealharwell.com jquinn@nealharwell.com jharbison@nealharwell.com

Counsel for Defendant NRA Foundation, Inc.

CERTIFICATE OF SERVICE

I, William J. Harbison II, one of the attorneys for Defendant NRA Foundation, Inc., certify that I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court on November 11, 2019, using the CM/ECF system, which will send notification to all counsel of record, and sent a copy of the same to the pro se Plaintiff via U.S. Mail to the address below:

Attorneys for NRA and LaPierre Defendants:

LACY, PRICE & WAGNER, P.C. Wallace A. McDonald (BPR # 16210) 249 N. Peters Road, Suite 101 Knoxville, TN 37926 (865) 246-0800 amcdonald@lpwpc.com

Plaintiff (Pro Se):

David Dell'Aquila 862 Bresslyn Road Nashville, TN 37205 (615) 924-4295 daquila862@gmail.com

/s/ William J. Harbison II